

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA,)	
)	
v.)	Case No.: 1:23-cr-00103-LEW
)	
)	
ANGELO CASTIGLIOLA,)	
Defendant.)	

MOTION TO ENLARGE DEADLINES AND CONTINUE

NOW COMES the Defendant, by and through his Undersigned Counsel, and hereby requests that this Honorable Court enlarge the procedural deadlines in this matter and continue the case to the January trial list, and in support thereof states as follows:

1. Undersigned was appointed to this matter on August 31, 2023. Undersigned recently received the discovery in this matter, however, he has not had an opportunity to review it. In addition, the Defendant was arraigned on October 10, 2023.

2. Following the arraignment, the Court issued a Procedural Order setting various deadlines, as well as placing the matter for trial on the November trial list.

3. Due to the recent appointment, lack of review of recently received discovery, and current schedule with the courts, including a criminal jury trial, Undersigned will need more time to prepare and review discovery in this matter.

4. For these reasons, the Defense is requesting that deadlines in this matter be enlarged as follows:

- a. The deadline for filing any pretrial motions reset to December 19, 2023;
- b. Confer with the Government in regard to discovery and pretrial motions by November 1, 2023, or at a different time as agreed to by both sides; and
- c. Disclosure of expert witnesses by January 2, 2023.

5. In addition, due to the enlargement of these deadlines, the Defense is requesting that the matter be continued to the January trial list.

6. The Defense has consulted with the Government, and they do not object to this motion.

7. The Defendant waives his right to a speedy trial and consents to such time being excludable pursuant to Title 18, United States Code § 3161(h)(7)(A), and further states that the interest of justice would be furthered by the continuance/enlargement of time for the reasons stated herein.

WHEREFORE, the Defense respectfully requests this Court grant this motion in all respects and order any further relief it deems just and proper.

Respectfully submitted,

Dated: October 13, 2023

/s/ Scott Hess

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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2023, I filed the foregoing Motion to Enlarge Deadlines and Continue using the Court's CM/ECF system, which will cause a copy of the Motion to be sent to all counsel of record.

/s/ Scott Hess

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